Elyse D. Echtman +1 212 378-7551 direct eechtman@steptoe.com

1114 Avenue of the Americas New York, NY 10036-7703 212 506 3900 main www.steptoe.com

MEMO ENDORSED

Steptoe

USDC SDNY
DOCUMENT
ELEÇTRONICALLY FILED
DOC #:
DATE FILED: 2/25/22

February 22, 2022

By ECF

Hon. Barbara Moses, U.S.M.J. United States District Court for the Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street, Room 740 New York, NY 10007

Re: DISH Network L.L.C., et al. v. Asia TV USA Ltd., et al., No. 19 Civ. 21 (VSB) (BCM) Consent Letter Motion for Scheduling Adjustments

Dear Judge Moses:

We write on behalf of Plaintiffs to request two scheduling adjustments in the above-referenced case. We have conferred with Defendants' counsel on these requests and have obtained their consent to the scheduling adjustments.

First, we request that the fact discovery period be extended for one additional week, from February 26, 2022 to March 6, 2022. There is good cause for this week-long extension. I had a death in my family on Monday, February 21 that required the cancellation of depositions scheduled for February 22 and 23. We are in the process of re-scheduling those depositions for the week of February 28.

Second, we request an adjournment of the status conference currently scheduled for March 17, 2022, ECF No. 472, to March 21, 22, 29 or 30, to the extent that those alternative dates might be available on the Court's calendar. This conference was previously adjourned from February 17, 2022, to March 17, 2022, based on Defendants' request to extend discovery deadlines due to a COVID-19 outbreak at counsel's office. *See* ECF Nos. 471, 472. I have a family vacation conflict with the March 17 date, which falls during a spring break recess week.

Thank you for your consideration of these requests.

Application GRANTED. The March 17, 2022 conference is ADJOURNED to April 7, 2022 at 12 noon in Courtroom 20A of the Daniel Patrick Moynihan United States Courthouse. No later than March 31, 2022, the parties shall submit a joint status letter to the Court outlining the status of discovery and any settlement efforts. SO ORDERED.

Barbara Moses

United States Magistrate Judge

February 25, 2022